

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

STEPHEN McCOLLUM, and SANDRA	§	
McCOLLUM, individually, and STEPHANIE	§	
KINGREY, individually and as independent	§	
administrator of the Estate of LARRY GENE	§	
McCOLLUM,	§	
PLAINTIFFS	§	
	§	
v.	§	CIVIL ACTION NO.
	§	4:14-cv-3253
	§	JURY DEMAND
BRAD LIVINGSTON, JEFF PRINGLE,	§	
RICHARD CLARK, KAREN TATE,	§	
SANDREA SANDERS, ROBERT EASON, the	§	
UNIVERSITY OF TEXAS MEDICAL	§	
BRANCH and the TEXAS DEPARTMENT OF	§	
CRIMINAL JUSTICE.	§	
DEFENDANTS	§	

**PLAINTIFFS' PARTIALLY OPPOSED MOTION FOR LEAVE TO EXCEED PAGE  
LIMIT IN RESPONSE TO DEFENDANTS' OBJECTIONS TO SUMMARY JUDGMENT  
EVIDENCE**

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Plaintiffs respectfully request leave of Court to file their response to Defendants' objections to the summary judgment appendix in excess of the Court's 25 page limit. Plaintiffs expect the body of the filing to be less than 50 pages in length. UTMB is unopposed, but TDCJ replied that they could not state their lack of opposition without conditions.

The Defendants object to mostly overlapping subsets of Plaintiffs' appendix, raising objections to more than 100 exhibits. UTMB's objections are 42 pages long, while TDCJ's brief objections cover a similar number of exhibits in substantially less detail. *See* Docs. 321, 322.

In order to address each objection to each exhibit, Plaintiffs respectfully request that the Court grant leave to file a response which, excluding the style, required table of contents, table of authorities, and signatures, is not more than 50 pages long.

Dated: November 2, 2016.

Respectfully submitted,

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CERTIFICATE OF SERVICE

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Southern District of Texas.

By /s/ Jeff Edwards  
JEFF EDWARDS

CERTIFICATE OF CONFERENCE

By my signature below, I certify that I corresponded with counsel for Defendants. Counsel for UTMB stated that they were unopposed to the relief requested. Counsel for TDCJ stated they were unopposed “if and only if” Plaintiffs reached an agreement with TDCJ on another matter. No agreement on that matter has been reached.

By /s/ David James  
David James